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Acting Cabinet Secretary

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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

September 12, 2016

Mark Patterson  
FWDA  
BRAC Coordinator  
P.O. Box 93  
Ravenna, OH 44266

Steve Smith  
USACE FWDA Program Manager  
CESWF-PEC-EF  
819 Taylor Street, Room 3A12  
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS  
FINAL, GROUNDWATER PERIODIC MONITORING REPORT  
JULY THROUGH DECEMBER 2015  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-16-004**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has reviewed the *Final, Groundwater Periodic Monitoring Report, July through December 2015* (Report), dated May 27, 2016 for the Fort Wingate Depot Activity (Permittee). NMED hereby issues this Approval with Modifications with the following comments.

**Comments:**

**1. Section 6.2 Recommendations, page 6-2, lines 27-30:**

**Permittee Statement:** "Re-survey the elevations of all bedrock monitoring wells. Wells were surveyed during multiple events which is believed to have introduced errors into the measured groundwater elevation data and associated groundwater potentiometric surface maps. The mapped groundwater flow directions in the bedrock aquifer conflict with the observed contaminant distributions."

**NMED Comment:** The Permittee does not address the possibility that alluvial monitoring wells may also be affected by survey errors introduced by wells having been installed and surveyed during different field events. The Permittee must re-survey all existing alluvial monitoring wells in addition to all bedrock monitoring wells facility-wide before the Spring 2017 sampling event. The Permittee must also provide depth corrections for all previously collected groundwater data that may be affected by survey errors or treat all data collected after the re-survey as separate from data collected before the re-survey. The Permittee must submit a completion schedule for the re-survey to NMED by **November 15, 2016**.

**2. Section 6.2 Recommendations, page 6-3, lines 1-3:**

**Permittee Statement:** "No additional sampling for nitrate/nitrite is recommended at TWM28 because the constituents were not detected in the sample from the Fall 2015 monitoring event. These results along with the groundwater gradient data confirm that nitrate detections at BGMW02 are not associated with the FWDA nitrate plume."

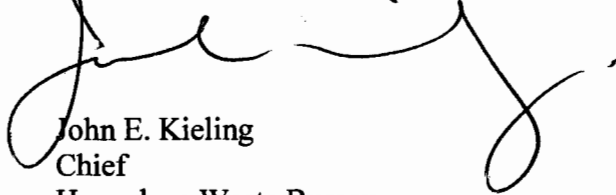
**NMED Comment:** NMED agrees that groundwater sample results from monitoring well TWM28 and alluvial groundwater gradient data indicate that nitrate detections in monitoring well BGMW02 are not likely to be related to FWDA activities. However, NMED requires the Permittee to sample both wells for nitrates/nitrites during the 2018 groundwater monitoring activities in order to confirm that the alluvial groundwater in the vicinity of BGMW02 and TWM28 has not been impacted by FWDA activities.

The Permittee must submit a completion schedule for the re-survey to NMED by **November 15, 2016** and propose to sample BGMW02 and TWM28 in the 2018 Interim Measures Facility-Wide Groundwater Monitoring Plan.

Messrs. Patterson and Smith  
September 12, 2016  
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Please contact Robert Murphy of my staff at (505) 476-6022 should you have any questions.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

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File: FWDA 2016 and Reading, FWDA-16-004, AWM, GW PMR July-December, 2015